

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

as representative of

THE COMMONWEALTH OF PUERTO
RICO, et al.

Debtors

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

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2020 MAY 26 PM 4:57
CLERK'S OFFICE
U.S. DISTRICT COURT
SAN JUAN, P.R.

**MOTION IN OPPOSITION TO ONE HUNDRED NINETY THIRD OMNIBUS
OBJECTION (NON-SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO,
PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY, AND
EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE
COMMONWEALTH OF PUERTO RICO TO SATISFIED CLAIMS**

To the Honorable United States District Court Judge Laura Taylor Swain:

COMES NOW, creditor **Lorenne E. Montalvo-García** and states, alleges and prays:

1. The Commonwealth of Puerto Rico, the Puerto Rico Highways and Transportation Authority and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, by and through the Financial Oversight and Management Board of Puerto Rico, filed a "One Hundred Ninety-Third Omnibus Objection" to the fully satisfied claims listed on **Exhibit A** of said Motion. Said Motion was received by ordinary mail by the subscriber.



2. In the aforementioned **Exhibit A**, in page 101 of 157, appears the proof of claim filed by Lorene E. Montalvo-García, a proof of claim #28972 that was filed asserting liability on the basis of a tax refund/return (pertaining to income tax for tax year 2016).

3. In said **Exhibit A**, on page 101, in regards to proof of claim # 28972, it says that the records of the Department of Treasury show that such refund/return was fully satisfied, pursuant of Check No. 19301256 dated 7/31/2017.

4. Notwithstanding, **Exhibit A** didn't include a photocopy of said Check No. 19301256 dated 7/31/2017, so I could see the check, where it was sent, and if someone cashed said check. I didn't receive this check.

5. Therefore, I am requesting for the Department of Treasury, through the Financial Oversight and Management Board of Puerto Rico, to produce copy of said Check No. 28972 dated 7/31/2017, and/or to write a new check to the order of Lorene E. Montalvo-García for the amount of \$2,763.

6. The subscriber is aware that this Motion in Opposition was sent one day after the deadline given by this Honorable Court. We apologize to the Court since our intention never was to disobey any order. Since the start of the Pandemic, I had to restructure all the homeschooling for my child who has special needs. Being a single mother, this task has proven to be quite challenging and extremely time consuming, and in addition, there is the lockdown. Also, the one day delay won't be harming to any parties rights. Therefore, we request this Honorable Court to accept our apologies and find the subscriber in compliance with the Court Order.



WHEREFORE, it is respectfully requested that the Honorable Court takes notice on this matter, accepts our apologies, and finds the subscriber in compliance with the Court Order, and orders The Financial Oversight and Management Board for Puerto Rico to produce, and send by ordinary mail to the subscriber, copy of the Check No. 28972 dated 7/31/2017, or, on in the alternative, to write and send by ordinary mail a new Check to the order of Loreenne E. Montalvo-García for the amount of \$2,763.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico at 20th of May, 2020.

I HEREBY CERTIFY: That on this same date it was send by mail to the following addresses: Clerk's Office, United States District Court, Room 150 Federal Building, San Juan, PR 00918-1767; Counsel for the Oversight Board, Proskauer Rose LLP, Eleven Times Square, New York, New York 10036-8299, Attn: Martin J. Bienenstock, Brien S. Rosen, Counsel for the Creditor's Committee, Paul Hastings LLP, 200 Park Avenue, New York, New York 10166, Attn: Luc A. Despins, James Bliss, James Worthington, G. Alexander Bongartz.


S/ LORENNE E. MONTALVO GARCIA

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